

AB:MJB

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

YIU FAI WONG,

Defendant.

- - - - -X

19-MJ-1026

COMPLAINT

(T. 18, U.S.C., § 1951)

EASTERN DISTRICT OF NEW YORK, SS:

SOTIRIOS V. MALAMIS, being duly sworn, deposes and states that he is a Special Agent with the Drug Enforcement Administration (“DEA”), duly appointed according to law and acting as such.

On or about October 31, 2019, within the Eastern District of New York, the defendant YIU FAI WONG did knowingly and intentionally conspire to obstruct, delay and affect commerce and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of marijuana in Brooklyn, NY.

(Title 18, United States Code, Section 1951)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the DEA and have been for approximately ten years. In my capacity as a Special Agent, I have participated in investigations of narcotics and money laundering activities, including surveillance and the execution of search warrants and the monitoring of electronic tracking devices. I am familiar with the methods used to package and process controlled substances, including marijuana. I am familiar with the facts and circumstances of this investigation from my personal participation in this investigation, and from information obtained from other law enforcement agents and others. I have been involved in numerous investigations involving marijuana distribution, packaging, sales, and other criminal activities associated with marijuana

2. The information set forth below is based upon my experience and training as a Special Agent, my review of documents and other evidentiary items, my debriefing of witnesses, and my discussions with other law enforcement personnel, including those who primarily prosecute drug trafficking and money laundering. Unless specifically indicated, all conversations and statements described in this affidavit are related in sum and substance and in part only.

3. On or about October 31, 2019 I was present at the Stop & Stor Storage Facility located at 534 63<sup>rd</sup> Street, Brooklyn, NY 11220 ("STORAGE FACILITY"). I was at

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

the STORAGE FACILITY with other members of law enforcement investigating the distribution of narcotics, specifically large quantities of marijuana

4. While at the STORAGE FACILITY, I observed multiple individuals unload several large pallets of marijuana from a truck. In total, approximately 830 pounds of marijuana was unloaded from the truck and placed inside a storage unit located inside the STORAGE FACILITY.

5. Co-Conspirator #1 and defendant WONG were together and present at the STORAGE FACILITY while law enforcement spoke with the individuals who were observed unloading the marijuana from the truck. Co-Conspirator #1 stated that he did not know any of the individuals involved in the marijuana distribution investigation and that he was at the STORAGE FACILITY to check on a unit rented by his friend. Co-Conspirator #1 did not know the name of his friend that rented the unit.

6. Co-Conspirator #1 consented to the search of the storage unit he was checking on at the request of his friend, and provided law enforcement the key to unlock the unit. The following items were located inside the storage unit: zip-ties, dust masks (or surgical masks), tape, large bolt cutter, and two (2) black air pistols that resembled handguns manufactured by Glock. Co-Conspirator #1 and WONG were arrested and brought to the DEA Office located at 99 10<sup>th</sup> Avenue, New York, NY for questioning.

7. At approximately 8:00 PM a DEA Special Agent spoke with WONG in Mandarin. Prior to questioning, WONG waived his Miranda Rights orally and in writing Mandarin. In sum and substance and in part, WONG admitted he and Co-Conspirator #1 were waiting at the STORAGE FACILITY to steal the marijuana. WONG admitted that he

had been conducting surveillance at the STORAGE FACILITY in the days prior, and that he and Co-Conspirator #1 knew the material inside the pallets was marijuana.

8. WONG admitted that he knew the storage unit that Co-Conspirator #1 gave consent to search contained zip-ties, tape, bolt cutters and dust masks or surgical masks. WONG denied knowing that the air pistols were inside the storage unit.

9. WONG gave consent to search his cellphone, and also provided his thumbprint and passcode for access. A search of WONG's cellphone revealed that he discussed the robbery with Co-Conspirator #1 using a text application called WECHAT in the days leading up to his arrest.

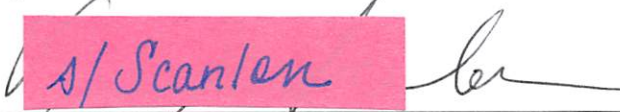
10. WONG's cellphone also contained photos and videos of the inside of the STORAGE FACILITY, which WONG admitted was part of the surveillance he was conducting in anticipation of the robbery.

WHEREFORE, your deponent respectfully requests that the defendant  
YIU FAI WONG be dealt with according to law.



SOTIRIOS V. MALAMIS  
Special Agent  
Drug Enforcement Administration

Sworn to before me this  
1<sup>st</sup> day of November, 2019



THE HONORABLE VERA M. SCANLON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK